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July 25, 2025

**VIA ECF**

Hon. Edgardo Ramos  
United States District Judge  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: Dumbo Moving & Storage, Inc. (“Dumbo”) v. Piece of Cake Moving & Storage LLC (“Piece of Cake”) et al, 1:22-cv-05138-ER (the “Action”)

Dear Judge Ramos:

We represent all Defendants in this Action except Volodymyr Plokykh (the “POC Defendants”). I am in receipt of the July 23, 2025 letter of Avram Frisch, counsel for Dumbo, representing that he expects Dumbo’s complete document production to be made available to Defendants by Friday, August 1, 2025. To ensure no further delay with such production, we respectfully request that Your Honor so order this revised completion date for Dumbo’s document production. Counsel for Defendant Volodymyr Plokykh joins in this request and this letter.

As to the remaining issues discussed at the July 22<sup>nd</sup> conference regarding the operational software provided by Dumbo, including whether such software displays all of the alleged trade secret functionalities asserted by Dumbo in its current trade secret identification previously submitted to the Court, Defendants’ experts are in the process of currently analyzing such software. As Your Honor directed at the conference, Defendants will further meet and confer with Dumbo’s counsel regarding these issues and we will bring to the Court’s attention any deficiencies that cannot be amicably addressed by counsel.

Thank you.

Respectfully submitted,  
*Fred H. Perkins*  
Fred H. Perkins

cc: All counsel (via ECF)